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November 24, 2020

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

RE: *Contant, et al. v. Bank of America Corp., et al.*, No. 17-cv-3139

Dear Judge Schofield:

Pursuant to the Court's November 19, 2020, Final Judgment, Order of Dismissal with Prejudice, and Order Granting Motion for Final Approval of Class Settlements (ECF No. 460); and the Settlement provisions providing that the Claim Forms shall be approved by the Court prior to being disseminated to members of the Settlement Classes;¹ Plaintiffs respectfully submit this letter to request Court approval of the Claim Forms attached as Exhibits A and B to this letter.

The Claim Forms were prepared by Class Counsel in consultation with the Claims Administrator Heffler Claims Group, and with Plaintiffs' expert economic consultant Janet S. Netz, Ph.D, and her consulting firm applEcon. The proposed Claim Forms are consistent with and will help effectuate the Court-approved Plan of Allocation. *See* ECF 460, ¶ 6. The Claim Form attached as Exhibit A shall be disseminated to members of the Settlement Classes for whom Class Counsel have obtained transactional data. The Claim Form attached as Exhibit B will be disseminated to all other members of the Settlement Classes. The Claims Administrator will create fillable online versions substantially similar to the attached Claim Forms both of which will be made available on the Settlement website, fxindirectantitrustsettlement.com. The Claims Administrator will begin processing Claim Forms for distribution as soon as the Court approves the Forms.

¹ *See* Citigroup Settlement (ECF No. 274-1) at IX(d)(i); MUFG Bank Settlement (ECF No. 274-2) at IX(d)(i); SC Settlement (ECF No. 420-1) at IX(d)(i); SG Settlement (ECF No. 420-2) at IX(d)(i); Group Settlement (ECF No. 420-3) at IX(d)(i).

Counsel for the settling Defendants consent to this application.

Respectfully submitted,

/s/ Michael Dell'Angelo
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